

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

LAKHEATHA JONES,

Plaintiff,

Vs.

RENTON COLLECTIONS INC.,

Defendant.

CASE NO. 3:10-cv-05866-RBL

**ANSWER TO PLAINTIFF'S
COMPLAINT**

COMES NOW the Defendant in the above entitled action and answers Plaintiff's complaint as follows:

I. NATURE OF THE ACTION

1. Defendant admits that the Plaintiff has filed a complaint for alleged violations of the FDCPA, 15 U.S.C. § 1692 et seq.

II. JURISDICTION AND VENUE

2. Defendant admits that this Court has jurisdiction over the parties. All other allegations in paragraph 2 are denied.

ANSWER- 1

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3. Defendant admits that venue before this court is proper. All other allegations in paragraph 3 are denied.

III. PARTIES

4. Defendant has insufficient knowledge with which to admit or deny the allegations contained in paragraph 3 and therefore denies same.
5. Defendant admits that Plaintiff is a consumer under the FDCPA definition.
6. Admit.
7. Admit.

IV. FACTUAL ALLEGATIONS

8. Defendant has insufficient knowledge with which to admit or deny the allegations contained in paragraph 8 and therefore denies same.
9. Defendant has insufficient knowledge with which to admit or deny the allegations contained in paragraph 9 and therefore denies same.
10. Admit
11. Denied.
12. Denied.
13. Denied.
14. Denied.
15. Denied.

ANSWER- 2

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16. [Blank paragraph]

COUNT I: VIOLATION OF FAIR DEBT
COLLECTION PRACTICES ACT

17. Denied.

18. Denied.

V. AFFIRMATIVE DEFENSES

1. Plaintiff fails to state a claim upon which relief may be granted.
2. Plaintiff has failed to mitigate its damages.
3. Defendant reserves the right to add additional defenses as discovery continues.

VI. COUNTERCLAIM

4. The Plaintiff's action has been brought in bad faith for the purposes of harassment and needless increase in the cost of litigation. The factual allegations are not well grounded, not warranted on the evidence, nor are they grounded in reasonable belief.

ANSWER- 3

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PRAYER FOR RELIEF

WHEREFORE, having answered Plaintiff's complaint in full, Defendant prays as follows:

1. For Plaintiff's complaint to be dismissed with prejudice and that she be awarded nothing thereby;
2. For damages as the court deems just for the filing of a frivolous lawsuit and pursuant to 15 U.S.C. § 1692;
3. For all of Defendant's costs and reasonable fees accrued; and,
4. For any other relief that the Court deems just and proper.

DATED this 17th day of December, 2010.

RETACCO LAW OFFICES INC. P.S.

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ANSWER- 4

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